

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:20-CR-143
v.)	
)	Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,)	
)	
<i>Defendant.</i>)	
_____)	

**MOTION TO SEAL GOVERNMENT’S RESPONSE IN OPPOSITION TO
DEFENDANT’S MOTION**

The United States of America, by and through its undersigned counsel and pursuant to Local Criminal Rule 49(C) and 49(E), moves to file under seal the government’s Response in Opposition to the Defendant’s Motion [Dkt. No. 451]. An un-redacted copy of the response will be delivered to the clerk’s office with a copy of this motion and provided to opposing counsel. A proposed Order is attached for the consideration of the Court.

The government’s response contains information regarding the defendant’s health and material subject to a protective order. Sealing is necessary to safeguard the privacy of the defendant and his medical information, as well as this sensitive discovery material. Counsel for the government has considered procedures other than sealing and none will suffice to protect this information from disclosure.

The Court has supervisory power over its own records and may, in its discretion, seal documents if the public’s right of access is outweighed by competing interests. *In re Knight Pub. Co.*, 743 F.2d 231, 235 (4th Cir. 1984). Such sealing is within the discretion of this Court and may be granted for “any legitimate prosecutorial need.” *United States v. Ramey*, 791 F.2d 317,

321 (4th Cir. 1986); *see also*, *Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

Accordingly, the United States requests that the government's Response in Opposition to the Defendant's Motion [Dkt. No. 451] remains under seal until further order of the Court.

Respectfully submitted,

Raj Parkeh
Acting United States Attorney

Date: September 16, 2021

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/
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